Clear Creek Ranger District
PO Box 3307
Idaho Springs, CO 80452
Via email: comments-rocky-mountain-arapaho-roosevelt-clear-creek@fs.fed.us
RE: Loveland Dry Gulch Snowcat Expansion Project – Scoping Comments

August 10, 2018
Dear Mr. Haas,

Loveland Ski Area is a true gem in today's competitive ski industry and we need to protect these small ski areas since there is a market for this type of experience. Skiers and riders appreciate the lack of crowds on Loveland's slopes as well as in the lift line. Many appreciate the slower lifts knowing that faster lifts brings more crowds. But it is hard to stay small and simple when the competition (Vail Resorts in particular) is always focusing on becoming bigger. But bigger isn't always better. Expansions to Breckenridge and Arapaho Basin have contributed to more crowds and more problems with parking, employee housing, and public transportation. Finding employees is a big issue, especially ski patrollers with avalanche control skills. And it is becoming harder to find employees to work in the ski resort as well as the nearby towns. In addition, the impact on the environment – diminishing wildlife habitat and natural resources as well as the human environment – the loss of solitude in the backcountry – are issues that have reached their tipping point. But Loveland needs to stay competitive. Hopefully we can find some compromise in their request to expand, mostly by reducing the use of snowcats.

**WHY DOES LOVELAND NEED THIS?**

The purpose and need of this project is a growing demand for access to expert backcountry skiing terrain. Ironically, this proposal will diminish the current backcountry experience in this well-known area. Hagar Mountain and the Citadel and all the lower slopes in this Upper Dry Gulch Basin have been popular with backcountry skiers since the 1990's, and even more so in the last ten years, from late November all the way into June. Those seeking solitude and fresh tracks in the upper part of this wild drainage (1.31 Backcountry Recreation, non-motorized, with a ROS of semi-primitive) could see a dramatic change if Loveland's expansion goes through as currently proposed. This proposal could also impact the heavily used lower Dry Gulch area which sees heavier activity all winter long with the concern being that they might need to close the entire Dry Gulch/Trelease area during avalanche control work and this area will see a substantial increase of use since more backcountry skiers will be displaced from skiing the Upper Gulch zone and will instead stick to the lower terrain.

Is another purpose and need about staying competitive? This was mentioned briefly in the scoping document but was stated with more detail in their Master Plan.

*"As a result of evolving expectations and demands in today's skier/rider market, resorts are increasingly focusing on raising service standards, improving the recreational experience and addressing shortcomings in their terrain offerings and operations. In essence, Loveland must strive to improve its offerings in order to remain viable in the competitive destination and Front Range (defined as Colorado Springs, the greater Denver metropolitan area, and Boulder) dayskier/rider Market."*

While this makes sense in the ski industry world, it is important then for this EA to address the cumulative indirect effects which result from trying to stay competitive since this is a purpose and need. This proposal's purpose is as much about 'providing a backcountry experience' as it is about remaining 'viable in the competitive destination and Front Range skier market.' Trying to stay competitive translates with making your product more appealing and with this project, Loveland hopes that by providing backcountry ski terrain this will attract more people to ski their resort and keep their faithful clientele happy. Please address then the socio-economic cumulative effects from trying to compete – in particular, how can Loveland contribute with efforts to improve employee housing, parking, public transportation, and making sure Loveland will have enough employees to manage this terrain.

**DRY GULCH PARKING**

The most common parking area for the Backcountry ski zones described below is at the end of the exit 216 ramp from I-70 West. It is not ideal. There are cars exiting and entering I-70 right where folks are trying to park which makes it a somewhat hectic spot. This area has seen a dramatic increase in backcountry users over the last five years. Parking is becoming an issue. Often semi's will pull over here and block all the parking. Plowing is not always reliable which does cause some traffic issues and occasionally there will be vehicles (rental cars!) pulling off here for reasons other than skiing and getting stuck. Usually within a three hour period, we will see 10-15 cars there and this lot stays full with cars coming and going for most of the day. The other parking area to access this proposed expansion area is the west side of Eisenhower Tunnel, so you can skin up Straight Creek.

Parking at Dry Gulch is also used to shuttle ski tours (and hiking tours) from Dry Gulch to Herman or vice versa. Lastly, some folks park at Loveland Ski area and use the backcountry gate from Chair 8.

If this terrain is still open to the public who are not purchasing a lift ticket, will parking be improved in this lot? Can they plow their summer road deeper into Dry Gulch for more parking? Will the parking area be shut down during avalanche control work? Will there be any kind of notice at the parking lot that avalanche control work is occurring? Will Loveland Ski Area need to use this parking area?

**CUMULATIVE EFFECTS**

**Cumulative environmental effects** can be defined as effects on the environment which are caused by the combined results of past, current and future activities.

Dry Gulch, despite its proximity to I-70, is still a primitive, wild drainage largely untouched by humans in the summer and only visited by a relatively small number of skiers in the winter. But it is surrounded by much busier zones, and because of this, it is that much more critical to protect the wildness of Dry Gulch in light of the current and future cumulative effects from its neighboring environment.

So much of the surrounding drainages in this area have become very busy. Herman Gulch to the east is crowded in the summer but less so in the winter although it is a favorite snowshoe destination and backcountry skier traffic is increasing, especially with new guidebooks advertising the terrain up Herman. To the west of Dry Gulch is the Loveland Ski area which extends across a few basins, and further west is Coon Hill which sees heavy use both summer and winter, Loveland Pass is also very close to Loveland Ski Area and is crazy busy with shuttle skiers, backcountry skiers and summer hikers. Dry Gulch needs to remain somewhat wild in order to maintain balance in the natural environment of this general area.

Neighboring Backcountry ski destinations have gotten too crowded and folks are seeking out new terrain. Lower Dry Gulch, Trelease and Coon Hill, more remote parts of Loveland Pass, have become the next great place to ski since it isn't as crowded as others and is still an easy drive for Front Rangers. The cumulative effects from increasing crowds in backcountry ski destinations need to be understood and managed before allowing more ski area expansions into backcountry terrain.

Ski area expansions have displaced backcountry skiers. Breckenridge's expansion into Peak 7, Peak 6 and 5.5 eliminated a massive amount of backcountry ski terrain as well as substantially increasing traffic into the SKY chutes, Peak 5 and 4. A- Basin has also displaced backcountry skiers with first the Montezuma Bowl and now the Beavers and Steep Gullies. Copper Mountain has plans to expand into Tucker Mountain and Jacques Peak. A lack of backcountry ski gates and a lack of consistent access to these gates at ski areas has restricted how much terrain we can ski. Didn't Eldora just expand into areas which were used by Nordic skiers?

Backcountry ski huts have also diminished prime skiing destinations and wild landscapes – the Sisters Hut, the proposed Mosquito Pass Hut, and the Broome Hut.

Many areas have been closed to skiers due to private property issues with the nearby Climax Mine being a big one. Has the mine near Empire restricted skier access?

Lack of parking on state or county roads adjacent to public lands is also reducing the amount of terrain available. (Loveland Pass, Berthoud Pass, numerous areas throughout Summit County and most likely true for Clear Creek County as well.)

Backcountry skiing is booming, ski areas keep expanding and the loss of wild landscapes is reaching a tipping point especially in the extremely crowded Arapaho National Forest and the neighboring White River National Forest. Protecting these 'wild' drainages is essential to the future health of our backcountry lands. Denver is exploding in population as well as Summit County which in turn is why we are experiencing such a huge growth in backcountry skiers.

Adding 160-224 skiers a day is a drastic and permanent change to the wild quiet landscape of Dry Gulch, especially the primitive nature of Upper Dry Gulch which is probably more accustomed to 1 to 3 skiers every couple days and maybe 2-5 every few days from March until June. (Purely anecdotal experience, but it would be so helpful to verify these numbers if this proposal goes through.) Climate change, forest health, wildlife habitat fragmentation are all issues that have become much more critical since Arapaho National Forest last updated their Forest Plan in 1997.

## FOREST PLAN AND WINTER TRAVEL MANAGEMENT PLANNING

### Forest Plan

Forest Plan revisions are when that National Forest decides on ski area permit boundaries. Arapaho/Roosevelt last updated their Forest Plan in 1997. Forest Plans used to be updated every 10-15 years to address the changes, but given how the Forest Service has seen such enormous budget cuts we understand why it is taking longer to revise Forest Plans.

This EA should address the contrast between 1997 and 2018 and evaluate what was important back in 1997 to what is important today. In 1997 ski area growth was given higher priority and boundary requests were generally approved by National Forests, especially since there wasn't much conflict between user groups back then. But times have changed – now we are seeing a population explosion in Denver and much of Colorado; we are seeing the effects of climate change; backcountry skiing is booming; I-70 has become a nightmare; we have forest health concerns with spruce and pine beetle kill; we have Canadian Lynx now on the threatened endangered species list. None of these issues were on the radar in 1997 to the degree they are today. In 1997 Dry Gulch didn't have many visitors and so dividing this drainage down the creek where you have an 8.2 ski area prescription on one side of the valley and a 1.3 backcountry non-motorized semi-primitive might not have seemed like a weird way to manage this land. But in 2018 this does seem odd. Dry Gulch is now on the radar for human powered recreation and has been for the last ten years or so.

### Winter Travel Management Planning

With all due respect, we would like to first see Arapaho National Forest conduct a Winter Travel Management Plan before moving ahead with any winter projects. "Outdoor Recreation Trends and Futures: A Technical Document Supporting the Forest Service 2010 RPA Assessment" by H. Ken Corde , page 3 said that undeveloped skiing will increase by 55-106 percent by 2060. Downhill skier numbers fluctuate but overall have remained stagnant due to the cost of skiing and the lure of backcountry. We need a winter travel plan to address this growth.

Is there a backcountry and cross country ski inventory for Clear Creek and Summit County? A winter travel management plan would benefit from inventorying what actually is available to the backcountry or nordic skier, to the splitboarder, to the snowshoer.

So many backcountry ski destinations in Clear Creek and Summit County have become so crowded and this is why Dry Gulch/Trelease is seeing a surge of use. The same skiers who use Dry Gulch have been displaced from the following areas which are now so crowded that the need for fresh tracks, solitude, easy parking and possible wildlife encounters are gone. Here are some of the following backcountry areas which receive moderate to heavy use: Berthoud Pass, Loveland Pass, Jones Gulch, Butler Gulch, Indian Peaks, Rocky Mountain National Park, (new guidebook) Guanella Pass, Peak 1, SKY Chutes, Mayflower Gulch, Gold Hill, Buffalo Mountain, Coon Hill, Herman Gulch).

**SUGGESTED ALTERNATIVE 1**

Our main concern with this proposal is with how the two user groups of Dry Gulch don't mix very well. Backcountry skiers are looking for solitude, fresh tracks and a semi-primitive experience – which is the designated use for half of Dry Gulch. Snowcats, avalanche control work, 220 maximum people a day is in direct contrast to this experience.

Because the purpose of this expansion is to provide more expert backcountry skiing terrain, we believe that eliminating the snowcat routes into Dry Gulch would still meet Loveland's need as well as offering a compromise to the backcountry user group.

We believe a good compromise would be for Loveland to offer guests a snowcat ride from the top of Chair 8 and on up to the ridge but once skiers descend into Dry Gulch, they must return under their own human power, be it with an established bootpack or a skin track. No snowcats will be allowed into Dry Gulch. Skiers and riders could be guided, but those with backcountry skills might appreciate a or non-guided experience. Avalanche Control work would continue as planned but only within their SUP.

This might be more what folks are looking for when they say they want more of a backcountry experience. So many skiers and riders are terrified of backcountry skiing because of avalanche concerns, and often end up skinning ski areas instead just to familiarize themselves with the gear yet still frustrated that they aren't using this gear for what it was designed for. The number of people skinning at ski areas has increased dramatically. There is a market for this clientele. Many of us with advanced backcountry skills would also consider purchasing a Loveland Pass just to be able to 'backcountry ski' in the proposed area. It also would be unique to other ski resorts and could be a real draw to come ski Loveland. We would suggest testing this out for a few years to see how if it is successful.

This would eliminate so many of the issues with this expansion in particular habitat fragmentation and backcountry skier conflicts. It would reduce the number of skiers back there. The thought of skinning up from the bottom of Dry Gulch but then having to experience the

noise of snowcats and the possibility of 160-220 nearby skiers while you slowly make your way up Hagar or Citadel is an extreme change from the primitive experience currently available in Dry Gulch. The 1.3 prescription for most of this Upper Dry Gulch area means that this area should be managed to provide recreation in a natural-appearing landscape. This area is required to provide recreation near the primitive end of the ROS.

Without snowcat access we think the number of skiers using this terrain from Loveland ski area would be less, and even a lynx might still wander its way down the drainage, while not so much if there are 220 skiers plus a snowcat in this area.

Please do not allow this proposal to extend past its SUP. This acreage outside the SUP is used by the backcountry skier as a way to access Hagar or as a ski descent from Straight Creek into Dry Gulch. If nothing else, this terrain outside the SUP must serve as a buffer zone between the busy scene of this proposal to the backcountry skier seeking solitude.

We truly believe that eliminating the snowcat routes into Dry Gulch, which would in turn reducing the number of people in this drainage, is a good compromise for what the backcountry skier is losing with privacy and lack of fresh tracks. In addition, we think this could be a good competitive strategy for Loveland. No other ski area has tried this approach, yet we believe there is a demand for it. Hike-to terrain in other ski areas is gaining in popularity and many of us buy ski passes purely to be able to enjoy this type of human powered experience as well as quicker access to the backcountry.

**SUGGESTED ALTERNATIVE 2**

Loveland does sometimes need a large part of the season to get all of their snowcat operations going, especially the terrain near x13010. Does it make sense to maximize this terrain first before expanding further?

It would help to have numbers on their current snowcat offerings and how much it is utilized. It would also help to understand why it takes time to open- is it manpower, avalanche danger, wind, lack of snow for snowcats?

Before we allow Loveland to extend their snowcat operations, is there a way we can first improve the current existing snowcat operations so that they are open for a longer period? Maybe this is another scenario where the purpose and need can be met by offering more of an "expert backcountry terrain access" by allowing folks a more genuine 'backcountry' experience and instead of using a snowcat, limit folks for most of the season to only hike to this terrain rather than use a snowcat? Without having to rely on snow coverage for a snowcat, could this in turn allow the terrain to be open more often? Should we first see if offering this as a 'hike-to' experience rather than a snowcat, fulfills their guest's desires before expanding into a new drainage?

## BACKCOUNTRY SKIING DESCRIPTIONS IN DRY GULCH

While these descriptions below might be a little excessive for scoping, it could though serve to better understand what is going on in this area and the cumulative effects from this proposal.

This is organized first by describing the terrain closest to the parking lot (Lower Dry Gulch) and then onto Upper Dry Gulch Basin where the proposal occurs. It should be noted again that it is somewhat odd that one side of Dry Gulch is within an 8.22 ski area prescription and the other side of Dry Gulch is within a 1.3 primitive non-motorized backcountry prescription, divided only by the creek.

**LOWER DRY GULCH SKIING**

Backcountry ski destinations from the Dry Gulch/Trelease parking area are numerous. The heaviest zone in winter is the East/SE aspects of commonly called Trelease (more accurately called x12304) as well as the North Gullies of Dry Gulch, both of these are within Loveland's SUP. Less popular but still used in the Lower Dry Gulch Basin are the fun slopes off of the south side of Trelease (ending at the Loveland ski area ropes and in their SUP).

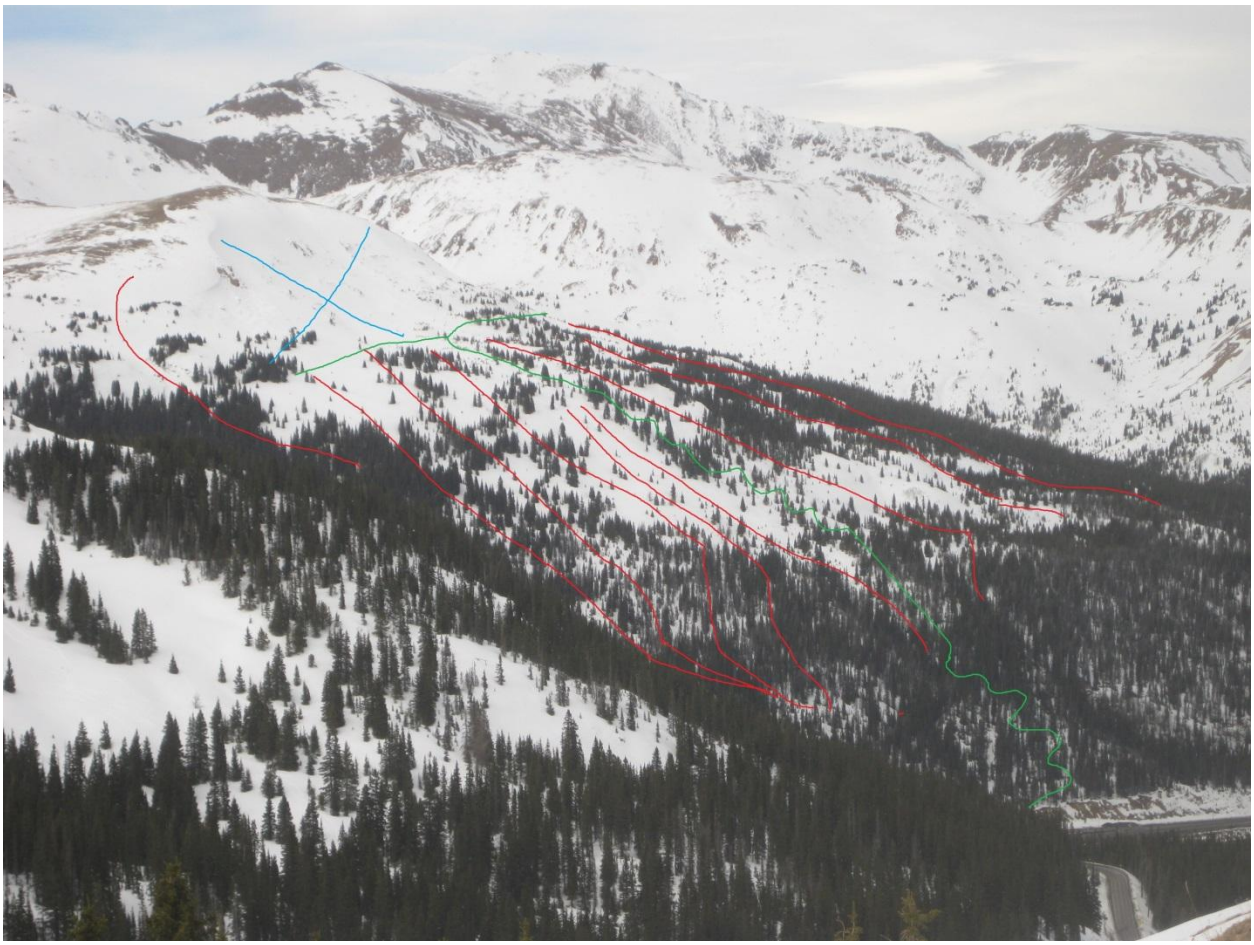
Outside their SUP, folks do ski the SW and SE slopes of Mt. Bethel as well as the summit and slopes below x12671. These areas are seeing an increase in use and offer great powder skiing and corn skiing when conditions warrant.

The Lower Dry Gulch area has seen a dramatic increase in use. It used to be more of a Summit and Clear Creek local destination but in the last few years there has been a dramatic surge of use from Front Range skiers, thanks to social media (Instagram in particular) and a few new guidebooks which market this terrain as a great grin to grunt ratio. It is truly superior terrain for a 1-6 hour tour with slopes varying from easy intermediate laps to steeper longer powder runs.

**x12304/aka Mt Trelease (in Loveland's SUP)**

Trelease or more accurately, x12304, is easily one of the best backcountry ski destinations in Summit and Clear Creek County because it is avalanche safe, below treeline (a rarity), offers easy access with lots of room for skiers and has consistent good early winter snow. Most of it is southeast to east facing and below treeline. You are actually skiing a sub peak of Mt. Trelease, x12304, with skiers usually stopping at the safe 11,600 elevation and skiing 600-800 foot laps through open meadows and down into glades at an average of 25-30 degree pitches. In the last few years, this has become a popular 'dawn patrol' destination for AT racers who (unfortunately) love to do quick laps but it has been frustrating for those of us who get there around 9 a.m. only to find the main slope completely tracked. Skiers are now heading further up Dry Gulch to find fresh tracks.

Loveland's expansion proposal might not directly affect Trelease but it is within their future plans to expand.



**Main Trelease zone. Red are ski lines. Green is uptrack. Blue is avy terrain we don't ski until spring. Dry Gulch is the drainage just past Trelease.**

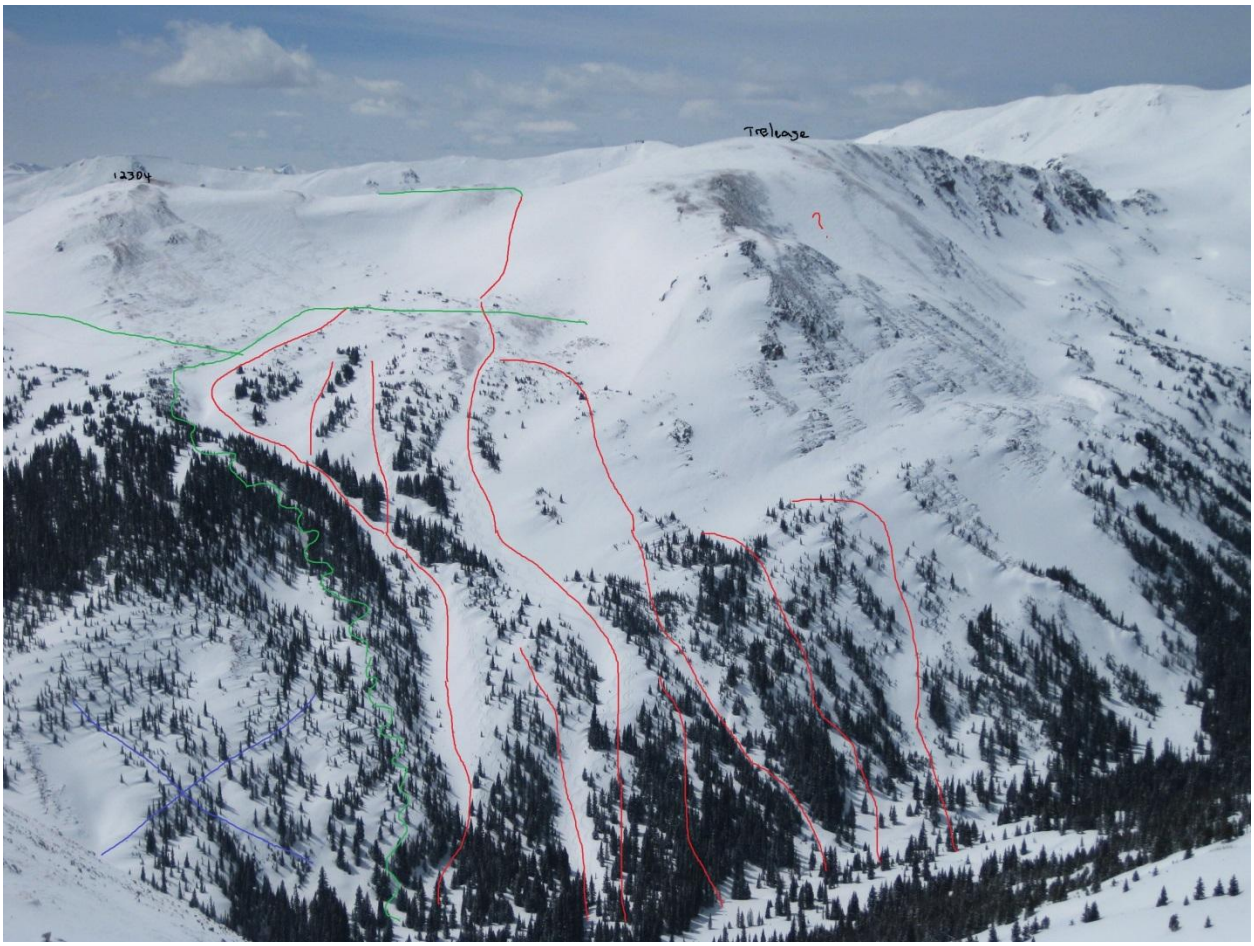
**Skiing to the parking lot. 12 cars?**

**Dry Gulch North Gullies (In Loveland's SUP)**

Dry Gulch North Gullies can be accessed in three ways – the first is to skin up the main skin track up Trelease and at 11,700 start traversing towards the north facing gullies. This route can be dangerous since you are crossing underneath avalanche terrain. The second way to access Dry Gulch is longer but safer and that is to skin up the Dry Gulch 'road' turning left uphill into the drainage itself, and finally turning left onto the main skin track up to the top of the north facing gullies. On the valley floor, you do cross underneath a north facing gladed slope that many are lured into skiing but it slides often in weird pockets and a few riders have triggered slides in here. The last approach route into Dry Gulch is to skin up the main Trelease skin track but eventually wrap around west towards Loveland ski area and then head north and up to the south facing saddle between x12304 and Mt. Trelease and drop into a northeast facing pitch which heads to the main skiing of Dry Gulch. (See pic.)

There are five or six lines through here, but most folks stick to about three main paths. This is serious avalanche terrain with lots of cross loading and gully features, but you can manage this terrain and ski it safely even under considerable avalanche danger. That being said, one person

has died in here and a few have been caught. The runs are amazing 25-35 degree 800 foot runs with cold north facing snow. Truly world class skiing. This area has been skied for many, many years. The last couple years have seen a dramatic increase in users and it seems to be popular on social media.




**Green is skin tracks. The one on the ridge is the route from the south side of Trelease. The green line heading horizontal is the 'dangerous' skin route from 'Trelease' or x12304. Blue X is the terrain that frequently slides and few folks will ski. Red are all the popular ski lines with the red lines furthest to the lookers left being the most popular. The Loveland expansion appears to begin on the far right corner of the photo possibly where the cliffy ridgeline ends.**

The two ways to exit this terrain is to either skin back up and head over to x12304 (Trelease) and ski the mellow pitches down to the parking lot or a quicker (but less pleasant) way is to ski down Dry Gulch and skin for about ten minutes back up to the car where the road parallels I-70.

This terrain is also within Loveland's SUP and is part of their expansion plans. The current expansion proposal could affect the use of this terrain if they feel inclined to close Dry Gulch

during avalanche control work. Another thought would be to take this area out of their SUP in exchange for their request in this proposal to expand outside their SUP.

**Lower Dry Gulch Southside – Mt. Bethel, x12438, and x12671 (outside their SUP)**
The entire south facing terrain up Lower Dry Gulch is not skied as frequently because you need to wait for good coverage which is usually late January. It is all amazing skiing and most of it is avalanche safe. It is truly some of the best powder or corn skiing around though when conditions warrant. Lately it has become busier as skiers are seeking out fresh tracks when Trelease and the North Gullies are overrun.

None of this terrain is in Loveland's SUP but it is so close to their SUP since the boundary goes right up the middle of the valley floor and the higher terrain is getting close to their proposal. Will the entire drainage shut down whenever there is avalanche control work? With this terrain prescripted as non-motorized backcountry, how will you preserve the ROS 'semi-primitive' experience yet allow for the noise from avalanche control work, 220 skiers per day and snowcats?

**South facing terrain in Lower Dry Gulch. Red lines are ski lines. Mt. Bethel is far right. The other high point in this pic is x12671 (left of center on red line).All runs finish on valley floor.**

**Heading up Dry Gulch. All the terrain showing is outside the SUP but popular with BC skiers. Highest rocky center background summit is Citadel. Round hump of a summit and the bowl just in front of it is the x12671 terrain. Hagar is not in this photo, but is just out of the frame to the left.**

**UPPER DRY GULCH SKIING**

The Upper Dry Gulch Basin and access to the proposed expansion require a longer skin in from the Dry Gulch parking area but there is usually a skin track in by mid-January. Some folks do access the proposed area from Loveland ski area via Chair 8 using the proposed expansion terrain to more quickly access the numerous ski descents in Dry Gulch. Another access route into the Upper Dry Gulch Basin is from the west side of Eisenhower Tunnel. Folks will skin up the west side of x13010 (Golden Bear Peak, south and east are in the SUP) or somewhere along this ridge and ski the proposed expansion area and then return the same way, or use this same tunnel approach as a quicker way to access Hagar via the ridge or via the proposed expansion terrain.

**x13294 or Citadel, Hagar Mountain. (not in SUP, but so close)**

Popular ski descents in the Upper Dry Gulch Area but not within the SUP are: 'The Citadel" or x13294. Another well-known and high quality ski descent going back to Brian Litz's 1990 guidebook is Mt. Hagar. By February folks will frequent this area more and by March and

through June many will ski up here. Hagar and Citadel are popular spring ski descents and social media (Instagram, #Hagarmountain) as well as guidebooks have increased the number of users.

Not clearly shown in the below photo is the ski descent off the north side of Citadel into Herman Gulch. Many folks will shuttle to ski this line, starting up Dry Gulch and finishing down Herman. Where exactly is the proposal's furthest boundary since it is difficult to understand from the scoping map. How will it interfere with the route up to Hagar by Backcountry skiers who put the effort to skin up this far for a primitive experience?

**Hagar Summit is far left. Citadel is the Rocky pointy triangular summit in the center of the photo. Backcountry skiers will ski Northeast, East, Southeast and south off of the summit of Citadel or more easily ski a hundred feet or so below Citadel heading east and southeast. We ski ALL the slopes you see down into Dry Gulch. Folks ski the true summit of Hagar but also the swaths of snow on either side of the summit. The proposed snowcat uptrack route and/or the project boundary area outside their SUP could also be the easiest way to access Hagar Mountain or Citadel. Everything you see off of Citadel is skied but the gentle shoulder east of Citadel is a great February/March safer descent.**

All of these descents would eventually feed down into Dry Gulch possibly within where their expansion is proposed. A winter site visit is necessary to better understand the conflicts which could arise.

**UPPER DRY GUCH SKIING WITHIN THE PROPOSAL**

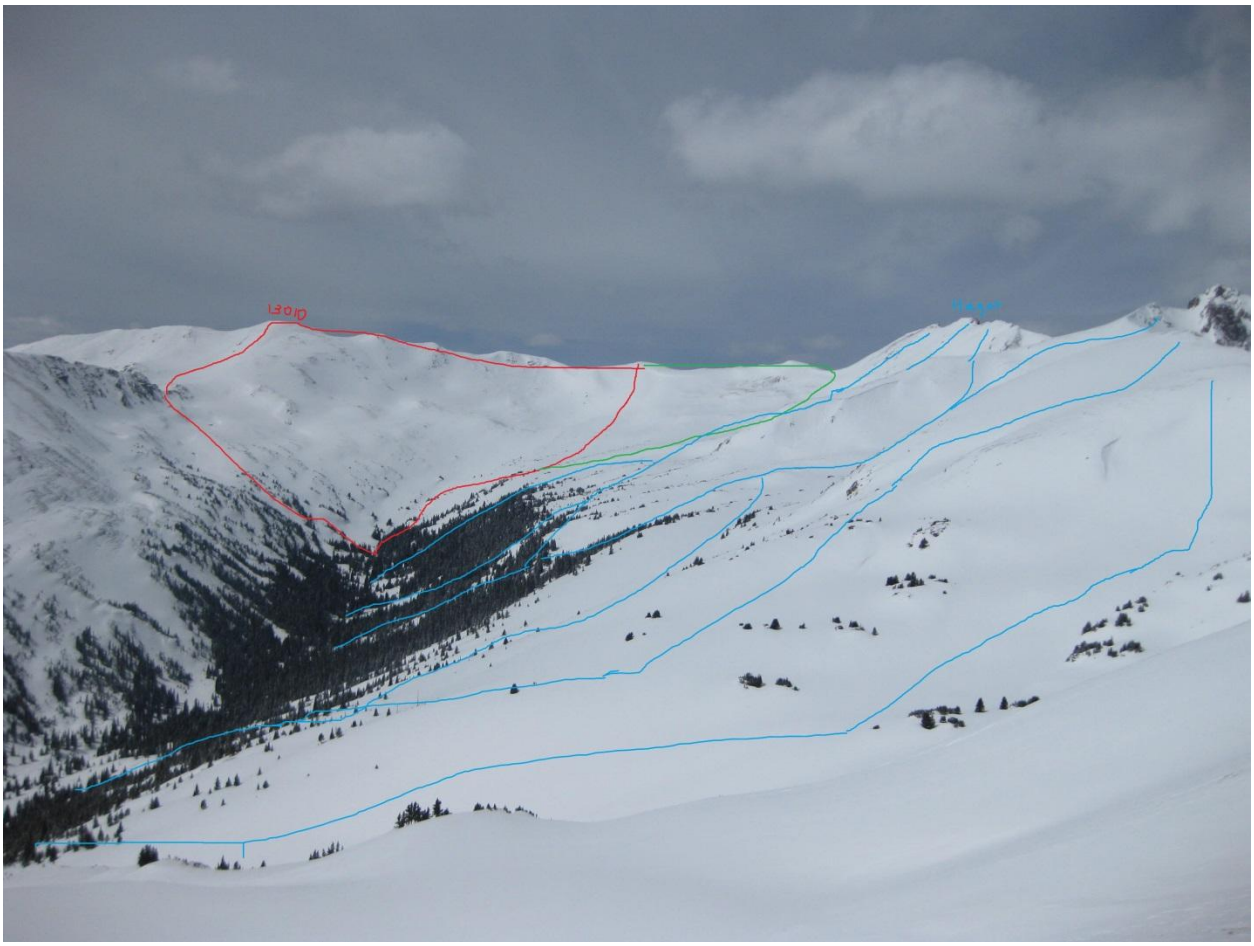
**x13010 (Golden Bear Peak), part of proposed expansion**

x13010 and its lower slopes (within this proposal), as well as from the ridge north of x13010 are great ways to access this high basin and then ski Hagar or Citadel. Also becoming more common, is to park at the tunnel and skin up the west side of x13010, then descend the terrain within this proposal and return the same way. Another tour is to park at the tunnel, skin up x13010 west or outside the SUP, ski down its east side, skin up Hagar or Citadel and ski down Dry Gulch to a shuttled vehicle at Dry Gulch. Lastly folks will just skin up Dry Gulch Parking area near I-70 and skin up the valley to ski x13010. It holds snow late into the spring.

**The high point in left side of pic is x13010. The sunny side of this peak is already within Loveland's operational use which in some seasons does take a while to open. Much of the terrain in this photo is within their proposed expansion, but a winter site visit will help clarify. The SUP boundary probably goes up the right edge of this photo.**

T**he lower slopes of x13010 within the proposed Expansion area**

The folks who ski the proposed terrain the most often probably have a Loveland ski pass. It is not heavily used, but it is really fun, somewhat easy skiing with enough low angle options to give a good experience. For a great description of this terrain, please refer to Fritz Sperry's backcountry skiing guidebook, "Making Turns in Colorado's Front Range, Volume 2.".




**Red is what could be their proposed expansion, (again a winter site visit would help). But what is odd is that on their proposal map they show that the snowcat and the ski terrain will mostly be the lower half of that red boundary line? Green is part of their proposal but not in their SUP but could be where most backcountry skiers will climb up to ski Hagar. Hagar is written in blue and Citadel is that pointy rocky summit off to the far right.**

All of this is popular spring skiing. The terrain they are asking for is actually not that desirable for the backcountry skier starting from the bottom of Dry Gulch given how hard it is to reach for such a short run so it is not a huge loss, but the main concern is how such a small expansion could negatively affect a huge amount of neighboring backcountry ski terrain with the loss of

solitude, the noise from a snowcat and the loss of fresh tracks since this area is sometimes skied. It is not at all what one would expect when heading up such a primitive quiet drainage of Dry Gulch.

**QUESTIONS ON THE PROPOSED EXPANSION**

What is puzzling is that the snowcat seems to only access the lower 800(?) feet of a 1600(?) foot descent from the ridge? How will this work? Will the snowcat take clients down to the drop off point? Or will the ridge be open for hiking? Will they allow skiers to descend down on top of snowcat skiers? Snow compaction will occur not just from snowcats but from 160-220 skiers per day either from the ridge or from the drop off point and this should be adjusted in the snow compaction acreage since that amount of skiers will make the snow firm (for a coyote!). How will skiers return back to Chair 8? Hike or take a snowcat back up? Are they going to have a bootpack to the top of the ridge? Will they allow folks to skin up rather than use the snowcat? Will they allow the public to use this terrain who approach it from the bottom of Dry Gulch? Will this be a free service for ski pass holders? If there is a guiding service from the ridge, how many clients per guide? Will the guides stay away from the backcountry ski terrain outside the SUP? Will there be a backcountry gate from this proposed area to the other side of Dry Gulch? If there is a gate, how will you maintain the ROS and the 1.3 desire to have "natural areas with little human-caused disturbances."

Expanding out their SUP is excessive, since already this is expanding into an area that is so primitive and used by backcountry skiers to get to Hagar as well as a good route for lynx travel. Why can't the snowcat just loop or go out and back within the SUP? Few, if any, backcountry skiers want to travel uphill adjacent to a snowcat moving uphill or have skiers skiing down on top of them. For how little they get for going outside their SUP, is it really necessary or appropriate? We need a site visit in the winter to see what this entails. At the very least, if they need to expand outside the SUP then please consider some sort of trade for removing lower Dry Gulch North Gullies out of their SUP. Also, it seems that once there is enough coverage, folks will want to ski off the ridge. Won't it be a rather unpleasant experience to ski off the ridge in powder, and then have to ski across a hardpack snowcat route?

**AVALANCHE CONTROL WORK**

With that much avalanche work, (12 routes) and the fact that they avalanche work could affect backcountry skiers coming up Dry Gulch to ski Hagar or Citadel, how are they going to manage that? It would be surprising to think that they would do avalanche work with the possibility of backcountry skiers coming up the valley, even if those skiers are just outside the SUP.
Will the avalanche control work close down access to Hagar since "Avy 11" is awfully close to the uptrack? Why do they need the north drop off? Will this terrain be roped off?

Are they going to rope off the entire Dry Gulch drainage during control work or only around the SUP? When will avalanche control work begin? How long will it take? Can we have a schedule? Often avalanche control work takes a lot of time since patrol might have to come back and do a second round. Is there enough avalanche certified patrollers to get this terrain open in a timely basis especially in regards to the workload they currently have to manage?

How will avalanche control work affect wildlife (Lynx, snowshoe hares). We are introducing a serious amount of new impact into a drainage that has remained relatively 'wild' over the years. This expansion will change the character of Dry Gulch forever. Upper Dry Gulch is so remote in the context of its surroundings, and is a prime lynx travel corridor and great habitat in the lower forest. The noise from avalanche control must be restricted.

Do we know if explosives could trigger slides past the SUP boundary? Has this been tested thoroughly? Even the Lower Dry Gulch skiers will find the noise from avalanche control work unpleasant yet this is designated as a 1.3 prescription where according to the Land and Resource Management Plan "noise from motorized use is a rare exception away from the area boundary." In addition the ROS for this management area is semi-primitive, yet avalanche work and snowcats really don't mix with this ROS. What month do they expect to get this open? When is the snow coverage usually good enough? It might be worth finding out when they usually are able to open their current avalanche terrain, especially the terrain accessed by snowcats.

**WILDLIFE**

A few years back, around when Canadian Lynx were reintroduced to this part of Colorado, and many were collared, Division of Wildlife conducted a winter lynx tracking study. Please reach out to CPW for more details on this because there was a map circulating that showed lynx using Dry Gulch and Herman Gulch. They also conducted a study where skiers could where a transmitter beacon while skiing Dry Gulch to see if Lynx were nearby. For some reason this study was discontinued. It's odd that Lynx use Dry Gulch and Herman Gulch more than Straight creek, despite Straight Creek having such a high level of wildlife protection since it is the only land bridge across I-70 for many miles. Why do Lynx use Herman and Dry Gulch? Is it because it is easier to travel through these drainages from the South Fork of Williams Fork? Or is it due to the lack of humans since Straight Creek is busy year round?

Often when hiking Straight Creek in the summer there is a large herd of Elk which graze there early in the morning and cross over down into the Williams Fork side during the day when the swarms of hikers (and sometimes skiers) are up there. Does this elk herd use Dry Gulch in June when the tundra is exposed? Elk are seen at high elevations in June much more frequently in other areas. Is this because of Climate Change?

**Conclusion**

Thanks for the opportunity to comment. We hope that our first suggested alternative is seriously considered since the current proposal has too many conflicts with the adjacent non-motorized backcountry recreation up Dry Gulch. Loveland Ski Area needs to remain viable in a very competitive ski industry and we believe this compromise will still allow them to improve their services and reduce the impacts into the greater Dry Gulch area.

Yours,

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